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**Sent:** Tuesday, July 14, 2020 3:57 PM  
**To:** CityClerk <CityClerk@longbeach.gov>  
**Subject:** Agenda Item #24

**-EXTERNAL-**

I object to this update to zoning regulations based on the following:

The safety of the public and the impacts of Covid-19 were not studied before recommending these policies. As of 4/19/20, the New York Times reported that there were 35,676 Covid-19 deaths nationwide. More than half, 18,690, of those deaths were in the New York metropolitan area alone. It appears as if high density and the necessity of using public transportation were a large contributor to the death totals. Some experts have speculated that in addition to the density and public transportation causes, areas of community use, such as elevators, were also a contributing factor.

The public was not notified that Housing First Policies in state law require: Tenant screening and selection practices promote accepting applicants regardless of their sobriety or use of substances, completion of treatment, or participation in services. Also, applicants are not rejected on the basis of ... criminal convictions ... or lack of "housing readiness."

The public was not notified that expansion of areas in which these housing services and housing developments are allowed also increases the possibility of neighborhoods having residents who are using alcohol and/or drugs (without attending rehabilitative services), and increases the possibility of neighborhoods having residents who are convicted criminals and may not be housing ready.

The public was not informed that the target population requirement for Supportive Housing will be eliminated. The public was informed incorrectly from the public outreach material: "The current definition does not specify a target population for supportive housing." However, from the current Long Beach Regulations: "Supportive housing" means housing with no limit on length of stay, that is occupied by the target population." ... The Target Population is defined in the next section. The new regulation will eliminate

the mandate that residents are from the “target population” to they may be from the “target population.” The public was not notified of this change.

The public has not been informed that Supportive Housing is under the category of Special Needs Housing.

The public has not been informed that Supportive Housing is subject to taxpayer funding.

In the Staff memo, the public was not notified that Supportive Housing may be permanent.

The public was not adequately informed of the changes to Supportive Housing. In the Staff memo, the list of changes in the second paragraph, which is a list of proposed changes, does not include mention of the proposed changes to “Supportive Housing.” The Staff memo does not make clear which category Supportive Housing fits under.

The public was not informed that Supportive Housing, which in State law is under the umbrella of low income housing, will be available for large Density Bonuses and up to four incentives.

From AB 1763: “The bill would also require that a housing development that meets these criteria [low income housing] receive 4 incentives or concessions under the Density Bonus Law and, if the development is located within ½ of a major transit stop, a height increase of up to 3 additional stories or 33 feet. The bill would generally require that the housing development receive a density bonus of 80%, but would exempt the housing development from any maximum controls on density if it is located within ½ mile of a major transit stop.”

The public was not informed about AB 1763, which is very impactful. AB 1763 should have been one of the bills which were evaluated by Development Services in regard to its impact when forming their recommendations.

The public was not informed of the parking impacts which will result from new developments based on these recommendations. There are minimal parking requirement in State Law and Local Ordinances for new developments.

The public was not informed that there is no indication that these housing options will be directed towards Long Beach residents or Long Beach area residents.

The public was not informed that these resources and housing will be available to out of area people who have relocated from an area of lower cost of living and will be immediately eligible as an “at risk” of homelessness applicant.

The public was not informed that a person may be designated as “homeless” if they make an oral statement that indicates a possibility of

future homelessness which will qualify someone to get housing in a Supportive Housing Development which can be permanent housing.

The public outreach material contained deceptive wording. On-site management may be present at all times during the operation of the facility. Why wasn't it worded as “on-site management in not required to be present at all times during the operation of the facility.”

The public was not informed on what the requirements are for “an appropriate level of security? The material states: “An appropriate level of security shall be provided at the interim housing facility.” What is the definition of “appropriate level of security.” In the legal sense, “shall” is not always mandatory.

The public was not informed on how the Neighborhood Compatibility component will be regulated. There are no requirements for on-site staff. From the material: “Neighborhood Compatibility. All programming shall take place on site, and not permit any queuing or loitering adjacent or abutting the site.” In the legal sense, “shall” is not always mandatory.

Janet West

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